UNITED STATES ENVIRONMENTAL PROTECTION AGENCY REGION III

1650 Arch Street Philadelphia, Pennsylvania 19103-2029

SUBJECT: Issuance of Underground Injection Control Permit

FROM: Kevin Rowsey

Source Water & UIC Section (3WD22)

TO: Cathy Libertz, Director

Water Division (3WD00)

Your concurrence is requested on the attached draft permit.

On October 8, 2020, Bull Run Resources, LLC, ("Bull Run") submitted a UIC permit application for the conversion of two active production wells to two operating class II-R enhanced recovery injection wells located in the Allegheny National Forest at the Curtis Lot 2 in Lafayette Township, McKean County, PA. Enhanced recovery is a process whereby fluid is injected into a geologic formation to help produce additional oil within the formation that was not produced during the original, primary oil production process. The draft permit will allow Bull Run to inject produced fluids into the Bradford Third & Lewis Run formations at depths of approximately 1,980 to 2,119 feet. If the final permit is issued to Bull Run, it will remain in effect for the operational life of the facility. A permit is required to meet the provisions of the EPA-administered UIC Program in Pennsylvania.

The draft permit will be public noticed for 30 days with opportunity to request a hearing. The public notice has been reviewed by LaRonda Koffi and Terri White. In lieu of providing a local library the administrative record during the Covid-19 pandemic, EPA will be posting all application materials, the draft permit, and the statement of basis on EPA's website. A virtual public hearing will be held if sufficient interest in the draft permit is evidenced. Due to these Class II injection wells being enhanced recovery and not disposal, EPA doesn't expect much public interest in this permit issuance. EPA will also be conducting a consultation with the Seneca Nation in New York regarding this permitting action because the site of the wells is located within the Allegheny River watershed.

PLEASE DO NOT SIGN OR DATE THE PERMIT. This is just the draft of the permit to be public noticed.

PERMIT: <u>BULL RUN RESOURCES, LLC</u>

200 LIBERTY STREET, SUITE 20 WARREN, PA 16365

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